COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

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ELECTRONIC INVESTIGATION)
INTO EXCESSIVE WATER LOSS BY)
KENTUCKY'S JURISDICTIONAL) CASE NO. 2019-00041
WATER UTILITIES)

RESPONSE OF

FARMDALE WATER DISTRICT

TO

COMMISSION'S REQUEST FOR INFORMATION

DATED MARCH 12, 2019

FILED: April 12, 2019

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RESPONSE OF FARMDALE WATER DISTRICT TO COMMISSION'S REQUEST FOR INFORMATION

Comes Farmdale Water District, for its Response to the Commission's Request for Information, and states as shown on the following pages.

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ELECTRONIC INVESTIGATION)
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WATER UTILITIES)

CERTIFICATION OF RESPONSE OF FARMDALE WATER DISTRICT TO COMMISSION'S REQUEST FOR INFORMATION

This is to certify that I have supervised the preparation of Farmdale Water District's Responses to the Commission's Request for Information. The response submitted on behalf of Farmdale Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: 4/12/19

Brian Armstrong, Manager

Farmdale Water District

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 1

Responding Witness: Brian Armstrong

Q-1. Provide the utility's monthly unaccounted for loss water loss percentage report with associated underlying data from January 1, 2018, to the date of the issuance of this Order.

A-1.

Background. Farmdale Water District (Farmdale) provides water service to approximately **2,655 customers**. Almost all of these customers are located in the southwest portion of Franklin County. A small portion of Farmdale's service area extends into Anderson and Shelby Counties. It purchases all its water from the Frankfort Electric and Water Plant Board (Frankfort Plant Board). Thus, Farmdale is a distribution system. It does not resell any water to another water utility.

Historic Water Loss. Historically, Farmdale has kept its water loss at manageable levels. From 2010 through 2014, its water loss ranged from 20.5% to 27.5%. It never exceeded 27.5% until 2015 when it peaked at 41.6%. In 2016, Farmdale's water loss was 39.2% and in 2017 it was

35.9%. In 2018, it was reduced to 28.0%. The following summary is helpful:

Water Loss
Percentage
28.0%
35.9%
39.2%
41.6%
22.7%
26.1%
20.5%
27.5%
23.1%

Water Loss Reports. Attached are the following Water Loss Reports:

- 2018 Water Loss Summary
- 2018 Annual Water Loss Summary Monthly Averages
- 2018 Monthly Water Loss Reports (January December)
- 2019 Monthly Water Loss Report for January 2019
- 2019 Monthly Water Loss Report for February 2019

Large Leak Found in 2018. During 2015, 2016, and 2017, Farmdale's water loss got out of control. The percentage remained above 35%. Farmdale knew that it had extremely high water loss, but it could not locate the source or sources of the loss. Then, in January and February of 2018, the water loss climbed to over 50%. Fortunately, the source of the biggest leak was located – a 4-inch water main located about 15 feet below grade under

U. S. Highway 127 (a 4-lane highway). The water main under the highway was replaced. The system-wide water loss immediately dropped to 15%.

2019 Leak. By January of 2019, Farmdale's water loss had risen to 37%. In February 2019, it was over 38%. Despite diligent efforts, Farmdale was unable to find the source or sources of the high water loss. On March 19, 2019, a customer reported a possible leak at 1410 South Benson Road. Farmdale immediately investigated and determined that the running water was potable water leaking from Farmdale's distribution system. The water line was repaired the very next day. Repairing this leak reduced Farmdale's water loss to less than 30%. Now the challenge is to start reducing the water loss until it is consistently below 20%. After that, efforts will be made to reduce it to less than 15% on a consistent basis.

FARMDALE WATER DISTRICT 2018 WATER LOSS

Month	Water Purchased	Water Sold	Other Water Used	Water Loss
			3334	
January	23,402	11,630	-	11,772
February	22,474	10,819	-	11,655
March	15,227	12,923	9	2,295
April	17,475	11,139	14	6,322
May	18,106	14,414	18	3,674
June	15,472	14,143	-	1,329
July	16,281	13,664	150	2,467
August	16,273	14,854	-	1,419
September	18,545	13,666	45	4,834
October	16,938	14,853	23	2,062
November	18,185	10,917	70	7,198
December	17,318	11,884	-	5,434
Total	215,696	154,906	329	60,461

Annual Average Water Loss 28.03%

Note: Volume amounts shown above are in thousands of gallons

Annual Water Loss Summary

Water Utility:

Farmdale Water District

For the Year:

2018

MONTH	WATER LOSS %
JANUARY	50.3
FEBRUARY	51.9
MARCH	15.1
APRIL	36.2
MAY	20.3
JUNE	8.6
JULY	15.2
AUGUST	8.7
SEPTEMBER	26.1
OCTOBER	12.2
NOVEMBER	39.6
DECEMBER	31.4
TOTAL ANNUAL WATER LOSS %	28.0

The highest water loss was [51.9]and occurred in the month of	DECEMBER
The lowest water loss was [8.6	and occurred in the month of	JUNE

LEGEND

Water Loss is less that 15% Water Loss is between 15% - 30% Water Loss is greater than 30%

vvate	r Utility:	Farmdale Water District		
For th	ne Month of:	January	Year:	2018
		ITEM		NS (Omit 000's)
1		CED, PURCHASED & DISTRIBUTED		
2	Water Produced Water Purchased			23,402
3 4	vvaler Purchaseu	TOTAL PRODUCED AND PL	IDCHASED	23,402
5		TOTALTRODUCEDANDIC	DROHAGED	
6	WATER SALES			
7	Residential			9,693
8	Commercial			1,937
9	Industrial			
10	Bulk Loading Stat	ions		
11	Wholesale			
12	Other Sales			
13		TOTAL WAT	TED CALES	49.7%
14		TOTAL WAT	IER SALES	49.7%
15	OTHER WATER	USED		
16		er Treatment Plant		
17	Wastewater Plant			
18	System Flushing			
19	Fire Department			
20	Other			
0.4		TOTAL OTHER WA	T-0.110-0	
21 22		TOTAL OTHER WA	TER USED	0.0%
23	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			11,772
27	Other			
			on-severalustriaring-colosis (Alleistates Lines	rejoint de la la la companie de la c
28		TOTAL	LINE LOSS	11,772 50.3%
29	Material Control			
30 31	Note: Line 13 + L	ine 21 + Line 28 Must Equal Line 4		
32	WATER LOSS PE	FRCENTAGE		
33		Water (Line 28 divided by Line 4)		
	0a000anica i oi	Traisi (Line 20 divided by Line 4)		

vvale	Cully:	Farmdale Vvater District		
For th	e Month of:	February	Year:	2018
	() (1)	ITEM	GALLO	NS (Omit 000's)
1	WATER PRODUC	ED, PURCHASED & DISTRIBUTED		a commence and a commence of the following the commence of the
2	Water Produced			
3	Water Purchased			22,474
4		TOTAL PRODUCED AND PUR	CHASED	22.474
5				
6	WATER SALES			
7	Residential			8,955
8	Commercial			1,864
9	Industrial			
10	Bulk Loading Station	ons		
11	Wholesale			
12	Other Sales			
13		TOTAL WATER	R SALES	48.1%
14				
15	OTHER WATER U	ISED		
16	Utility and/or Water	r Treatment Plant		
17	Wastewater Plant			
18	System Flushing			
19	Fire Department			
20	Other			
21		TOTAL OTHER WATE	R USED	0.0%
22				
23	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			11,655
27	Other			
28		TOTAL LIN	IE LOSS	11,655 51.9%
29				
30 31	Note: Line 13 + Lir	ne 21 + Line 28 Must Equal Line 4		
32	WATER LOSS PE			
33	Unaccounted-For \	Vater (Line 28 divided by Line 4)		

ater Utility:	Farmdale Water District		
or the Month of:	March	Year:	2018
i Jaw	in it con the state of the stat	CALLON	IS (Omit 000's)
1 WATER PROD	UCED, PURCHASED & DISTRIBUT	entra a contrata con contrata con contrata de la c	
2 Water Produce			
3 Water Purchase	ed		15,227
4	TOTAL PRODUCED AND	PURCHASED	
5			
6 WATER SALES	S		
7 Residential		- *	10,723
8 Commercial			2,200
9 Industrial			
10 Bulk Loading S	tations		
11 Wholesale			
12 Other Sales			
		velicite happy of colorabile (a) 400 (400 (400 (400 (400 (400 (400 (400	
13	TOTAL W	VATER SALES	84.
14			
15 OTHER WATE			
	ater Treatment Plant		
17 Wastewater Pla			
18 System Flushin			9
19 Fire Departmen20 Other	IT.		
20 Other			
21	TOTAL OTHER	WATER USED	9 0.1
22			0.1
23 WATER LOSS			
24 Tank Overflows			
25 Line Breaks			
26 Line Leaks			2,295
27 Other			
28	тотл	AL LINE LOSS	2,295 15.
29			
30 Note: Line 13 + 31	Line 21 + Line 28 Must Equal Line 4	Į.	
32 WATER LOSS			
33 Unaccounted-F	or Water (Line 28 divided by Line 4)		

Water U	Itility:	Farmdale W	ater District		
For the	Month of:		April	Year:	2018
			is and the second secon	GALLON	IS (Omit 000's)
		ED, PURCH	ASED & DISTRIBU	DELICIO CONTRACTO DE LA CONTRACTO DE LA CONTRACTO DE LA CONTRACTO DE LA CONTRACTOR DE LA CO	
1	Vater Produced				
3	Vater Purchased				17,475
4 [TOTA	L PRODUCED AN	ID PURCHASED	17.47.5
5					
	VATER SALES				0.470.1
1	tesidential Commercial				9,172
1	ndustrial				1,967
i i	lulk Loading Stati	ons			
1	Vholesale	0113			
1	ther Sales				
13			TOTAL	WATER SALES	63.7%
14					
	THER WATER L				
	Itility and/or Wate	r Treatment P	lant		
	Vastewater Plant				
	ystem Flushing				13
	ire Department				1
20 0	other				
21			TOTAL OTHER	R WATER USED	14 0.1%
22					_
	VATER LOSS				
1	ank Overflows ine Breaks				: Althoras and the c
3	ine breaks ine Leaks				0.000
	other				6,322
21	uici				
28			TO	TAL LINE LOSS	6,322 36.2%
29 30 N	oto: Line 42 : 1:	no 21 z Lina 1	O Much Enviol 1 in a	4	
30 N	ote. Line 13 + Li	He ZI + LINE 2	28 Must Equal Line	4	
32 V	ATER LOSS PE				
33 Ū	naccounted-For \	Water (Line 28	3 divided by Line 4		1

Water Utility:	Farmdale Water District		
For the Month of:	May	Year:	2018
LINE #	TEM	- A	NS (Omit 000's)
wksk	UCED, PURCHASED & DISTRIBU	a control of the filter of the control of the contr	
2 Water Produced			
3 Water Purchase	ed		18,106
4	TOTAL PRODUCED AN	D PURCHASED	3.106
5		·	
6 WATER SALES	8		
7 Residential			12,130
8 Commercial			2,284
9 Industrial			
10 Bulk Loading St	ations		
11 Wholesale			
12 Other Sales			
13	TOTAL	WATER SALES	14.414 79.6
14			
15 OTHER WATE	R USED		
16 Utility and/or W	ater Treatment Plant	Santa est	e je viejske kidekspranjedatas
17 Wastewater Pla	nt		
18 System Flushin	g		17
19 Fire Departmen	t		1
20 Other			
21	TOTAL OTHER	R WATER USED	13, 0.19
22	TOTAL OTTLE	WAILKOOLD	[0.17
23 WATER LOSS			
24 Tank Overflows			
25 Line Breaks			
26 Line Leaks			3,674
27 Other			
28	TO	TAL LINE LOSS	3,674 20.3
29	***************************************		
30 Note: Line 13 + 31	Line 21 + Line 28 Must Equal Line	4	
32 WATER LOSS	PERCENTAGE		
33 Unaccounted-F	or Water (Line 28 divided by Line 4)		20.37

vvater	Utility:	Farmdale Water District		
For the	e Month of:	June	Year:	2018
	Francisco (Constitution of Constitution of Con	ITEM	. CALLO	ONS (Omit 000's)
1		ED, PURCHASED & DISTRIBUTED		
2	Water Produced			
3	Water Purchased			15,472
4		TOTAL PRODUCED AND PUR	CHASED	15,472
5				
6	WATER SALES			44.46
	Residential			14,143
8 9	Commercial Industrial			
10	Bulk Loading Station	one		
11	Wholesale	JIIS		
12	Other Sales			
1 2	Other Gales			
13		TOTAL WATER	RSALES	4 143 91.49
14				
15	OTHER WATER L	ISED		
16	Utility and/or Wate			
17	Wastewater Plant			
18	System Flushing			
19	Fire Department			
20	Other			
21		TOTAL OTHER WATE	RUSED	- 0.0%
22				
	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26 27	Line Leaks Other			1,329
21	Other			
28		TOTAL LIN	IE LOSS	8.6%
29	N. 1. 12 40 11	04		
30	Note: Line 13 + Li	ne 21 + Line 28 Must Equal Line 4		
31 32	WATER LOSS PE	DOENTAGE		
32 33				* #502\
33	Unaccounted-For	Nater (Line 28 divided by Line 4)		8.6%

vvater	Othity:	Farmdale Water District		
For th	e Month of:	July	Year:	2018
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	WATER RESOLUTION	ITEM	GALLO	NS (Omit 000's)
1 2	Water Produced	CED, PURCHASED & DISTRIBUTED		····
3	Water Purchased			16,281
4	Water Furchaseu	TOTAL PRODUCED AND PU	RCHASED	15.251
5		TOTAL TRODUCED AND TO		
6	WATER SALES			
7	Residential			11,362
8	Commercial			2,302
9	Industrial			a referen
10	Bulk Loading Stat	ions		
11	Wholesale			
12	Other Sales			
13		TOTAL WAT	ER SALES	13,664 83.9
14				
15	OTHER WATER			·
16		er Treatment Plant		
17	Wastewater Plant			4.2
18	System Flushing			
19	Fire Department			
20	Other	Drain tank for inspection	<u></u>	150
21		TOTAL OTHER MA	TED HOED	0.9%
22		TOTAL OTHER WA	IER USED	150 0.9%
23	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			2,467
27	Other			2,407
			· .	
28 29		TOTAL L	INE LOSS	2,467 15.2
30	Note: Line 13 + L	ine 21 + Line 28 Must Equal Line 4		
31 32	WATER LOSS PE			
33	Unaccounted-For	Water (Line 28 divided by Line 4)		1.5.21%
	B			

vvater	Othity:	Farmdale Water District		
For the	e Month of:	August	Year:	2018
Edi\(≡ ;		ITEM		DNS (Omit 000's)
1		ED, PURCHASED & DISTRIBUTED		
2	Water Produced			
3	Water Purchased			16,273
4		TOTAL PRODUCED AND PU	IRCHASED	18,273
5	WATED CALED			
6 7	WATER SALES Residential			44.754
8	Commercial			11,754
9	Industrial			3,100
10	Bulk Loading Stati	one		
11	Wholesale	ons		
12	Other Sales			
* ****				
13		TOTAL WAT	ER SALES	14,854 91.39
14				
15	OTHER WATER I	JSED		
16	Utility and/or Water	r Treatment Plant		
17	Wastewater Plant			Establish parties
18	System Flushing			
19	Fire Department			
20	Other			
24		TOTAL OTUED WA		
21 · 22	-	TOTAL OTHER WA	TER USED	0.0%
23	WATER LOSS			
23 24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			1,419
27	Other			1,710
28 29		TOTAL I	LINE LOSS	1.419 8.7%
30	Note: Line 13 + Li	ne 21 + Line 28 Must Equal Line 4		
31		·		
32	WATER LOSS PE			
33	Unaccounted-For	Water (Line 28 divided by Line 4)		77

Wate	r Utility:	Farmdale Water District		
For th	ne Month of:	September	Year:	2018
	#	ITEM	GALL	.ONS (Omit 000's)
1		CED, PURCHASED & DISTRIBUTED		
2	Water Produced			
3	Water Purchased			18,545
4		TOTAL PRODUCED AND PUI	RCHASED	
5				
6	WATER SALES			
7	Residential			10,924
8	Commercial			2,742
9	Industrial	•		
10	Bulk Loading Stati	ions		
11 12	Wholesale Other Sales			
12	Other Sales			
13		TOTAL WATE	ED CALEC	13.666 73.7%
14		TOTAL WATE	ER SALES	13,666 73.7%
15	OTHER WATER	ISED		
16	Utility and/or Water			
17	Wastewater Plant			
18	System Flushing			45
19	Fire Department			
20	Other			
	0.1.70.			
21		TOTAL OTHER WAT	ER USED	45 0.2%
22	<u> </u>			
23	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			4,834
27	Other			
28		TOTAL L	INE LOSS	4,834 26.1%
29	***************************************			
30	Note: Line 13 + Li	ine 21 + Line 28 Must Equal Line 4		
31 32	WATER LOSS PE	ERCENTAGE		
33	Unaccounted-For	Water (Line 28 divided by Line 4)		25.1%
	A			

Wate	r Utility:	Farmdale Water District		
For th	e Month of:	October	Year:	2018
MINER		ITEM	GALLO	NS (Omit 000's)
1		ED, PURCHASED & DISTRIBUTED		
2	Water Produced			e san dida
3	Water Purchased			16,938
4		TOTAL PRODUCED AND PUR	CHASED	(5.931)
5	W. TED 04. 50			
6	WATER SALES			
7	Residential			11,753
8	Commercial			3,100
9	Industrial			
10 11	Bulk Loading Stati Wholesale	ons		
12	Other Sales			
12	Other Sales	PARTICLE CONTROL OF THE CONTROL OF T	- 1987	
13		TOTAL WATE	R SALES	14,853 87.7%
14		·	KOALLO	07.77
15	OTHER WATER L	ISED		
16	Utility and/or Wate			
17	Wastewater Plant			. Jan 2017/7
18	System Flushing			23
19	Fire Department			
20	Other			
21		TOTAL OTHER WATE	ER USED	23 0.1%
22		. OTAL OTTER WATE	ER GOLD	
23	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			2,062
27	Other		_ *******	
28		TOTAL LIN	NE LOSS	2,062 12.2%
29				12.270
30	Note: Line 13 + Li	ne 21 + Line 28 Must Equal Line 4		
31				
32	WATER LOSS PE	RCENTAGE		
33		Water (Line 28 divided by Line 4)		2.2%

Wate	r Utility:	Farmdale Water District	····	
For th	ne Month of:	November	Year:	2018
	4	ITEM	GALLONS	(Omit 000's)
1		ICED, PURCHASED & DISTRIBUTED		And And Common Fernance and Common Fernance And Common
2	Water Produced			
3	Water Purchase		sava generalis com em militar per em se en em	18,185
4		TOTAL PRODUCED AND PL	JRCHASED	
5				
6	WATER SALES			
7	Residential			8,880
8	Commercial			2,037
9	Industrial			
10	Bulk Loading Sta	itions		
11	Wholesale			
12	Other Sales			
40		TOTAL 1444		
13		TOTAL WAT	ER SALES	60.0%
14	OTHER WATER	HOED		
15 16	OTHER WATER			
17	Wastewater Plan	ter Treatment Plant		
18	System Flushing			
19	Fire Department			32 38
20	Other			00 OO
20	Other			
21		TOTAL OTHER WA	TER USED	70 0.4%
22				
23	WATER LOSS			
24	Tank Overflows			
25	Line Breaks			
26	Line Leaks			7,198
27	Other			
28		TOTAL I	LINE LOSS	7,198 39.6%
29 30	Note: Line 12 ±	Line 21 + Line 28 Must Equal Line 4		
31	NOIS. LINE 13 T	Line 21 + Line 28 Must Equal Line 4		
32	WATER LOSS F	ERCENTAGE		
33	Unaccounted-Fo	r Water (Line 28 divided by Line 4)		100.00

December Year: 2018	Wate	r Utility:	Farmdale Water District		
WATER PRODUCED, PURCHASED & DISTRIBUTED	For th	ne Month of:	December	Year:	2018
WATER PRODUCED, PURCHASED & DISTRIBUTED					
Water Produced Water Purchased 17,318 17	4			57.1.51 	rake (allinanae)
### TOTAL PRODUCED AND PURCHASED 17,318	2				
## TOTAL PRODUCED AND PURCHASED 17,318		1			17.318
Residential	4		TOTAL PRODUCED AND PURC	CHASED	
Residential 9,166 2,718 10 10 10 10 10 10 10	5				
Commercial 2,718 Industrial Bulk Loading Stations Wholesale Other Sales	6				
Industrial Bulk Loading Stations Wholesale Other Sales	•	i .			
Bulk Loading Stations Wholesale Other Sales TOTAL WATER SALES 11,884 68.6% OTHER WATER USED Utility and/or Water Treatment Plant Wastewater Plant System Flushing Fire Department Other TOTAL OTHER WATER USED WATER LOSS Tank Overflows Line Breaks Line Leaks Other Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE		1			2,718
Wholesale Other Sales TOTAL WATER SALES 11,884 68.6% OTHER WATER USED Utility and/or Water Treatment Plant Wastewater Plant System Flushing Fire Department Other TOTAL OTHER WATER USED WATER LOSS Tank Overflows Line Breaks Line Leaks Other TOTAL LINE LOSS 5,434 31.4% Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE		1			
12 Other Sales			ons		
TOTAL WATER SALES 11,884 68.6% OTHER WATER USED Utility and/or Water Treatment Plant Wastewater Plant System Flushing Fire Department Other TOTAL OTHER WATER USED 0.0% WATER LOSS Tank Overflows Line Breaks Line Leaks Other TOTAL LINE LOSS TOTAL LINE LOSS Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE		1			
14 15 OTHER WATER USED 16 Utility and/or Water Treatment Plant 17 Wastewater Plant 18 System Flushing 19 Fire Department 20 Other 21 TOTAL OTHER WATER USED 22 23 WATER LOSS 24 Tank Overflows 25 Line Breaks 26 Line Leaks 27 Other 28 28 TOTAL LINE LOSS 5,434 31.4% 29 30 Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 31 32 WATER LOSS PERCENTAGE	12	Other Sales	***************************************		
14 15 OTHER WATER USED 16 Utility and/or Water Treatment Plant 17 Wastewater Plant 18 System Flushing 19 Fire Department 20 Other 21 TOTAL OTHER WATER USED 22 23 WATER LOSS 24 Tank Overflows 25 Line Breaks 26 Line Leaks 27 Other 28 28 TOTAL LINE LOSS 5,434 31.4% 29 30 Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 31 32 WATER LOSS PERCENTAGE	12		TOTAL MATE	CALEC	00.00
15 OTHER WATER USED 16 Utility and/or Water Treatment Plant Wastewater Plant System Flushing Fire Department Other 21 TOTAL OTHER WATER USED 22 WATER LOSS 23 WATER LOSS 24 Tank Overflows Line Breaks Line Breaks Line Leaks Cother 28 TOTAL LINE LOSS 29 Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE			TOTAL WATER	COALES	68.6%
Utility and/or Water Treatment Plant Wastewater Plant System Flushing Fire Department Other TOTAL OTHER WATER USED Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE		OTHER WATER II	ISED		
Wastewater Plant System Flushing Fire Department Other TOTAL OTHER WATER USED 0.0% WATER LOSS Tank Overflows Line Breaks Line Leaks Other TOTAL LINE LOSS TOTAL LINE LOSS TOTAL LINE LOSS TOTAL LINE LOSS MATER LOSS TOTAL LINE LOSS TOTAL LINE LOSS MATER LOSS TOTAL LINE LOSS TOTAL LINE LOSS MATER LOSS PERCENTAGE					
System Flushing Fire Department Other			Troumont rank		
Fire Department		i			
TOTAL OTHER WATER USED 0.0%					
22 23					
22 23	04				
23			TOTAL OTHER WATE	RUSED	0.0%
24 Tank Overflows 25 Line Breaks 26 Line Leaks 27 Other 28 TOTAL LINE LOSS 5,434 31.4% Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 31 32 WATER LOSS PERCENTAGE		WATERLOSS			
25 Line Breaks 26 Line Leaks 27 Other TOTAL LINE LOSS 5,434 29 30 Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 31 32 WATER LOSS PERCENTAGE					
26 Line Leaks Other 28 TOTAL LINE LOSS 5,434 31.4% 29 30 Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 31 32 WATER LOSS PERCENTAGE		1			
27 Other 28		1			5.424
28		i e			
Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE					
Note: Line 13 + Line 21 + Line 28 Must Equal Line 4 WATER LOSS PERCENTAGE	28		TOTAL LIN	IE LOSS	5.434 31.4%
31 32 WATER LOSS PERCENTAGE	29				
32 WATER LOSS PERCENTAGE		Note: Line 13 + Lir	ne 21 + Line 28 Must Equal Line 4		
			•		
Unaccounted-For Water (Line 28 divided by Line 4) 31.4%					
	33	Unaccounted-For V	Vater (Line 28 divided by Line 4)		

vvater	Utility:	Farmdale Water District		
For the	e Month of:	January	Year:	2019
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3	Water Purchased			17,469
4	<u> </u>	TOTAL PRODUCED AND PUR	CHASED	17,460
5	WATER OALEO			
6 7	WATER SALES Residential			8,799
8	Commercial			2,049
9	Industrial			2,049
10	Bulk Loading Stati	ons		
11	Wholesale	0113		
12	Other Sales			
1 dan	Other Galoc			
13		TOTAL WATE	R SALES	10.348 62.1%
14	<u></u>			
15	OTHER WATER I	JSED		
16	Utility and/or Water			and the second second
17	Wastewater Plant			
18	System Flushing			102
19	Fire Department			
20	Other		<u>.</u> 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	
21		TOTAL OTHER WAT	ER USED	102 0.6%
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23	WATER LOSS			
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25 26	Line Breaks Line Leaks			C F40
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21	Other		-	
28		TOTAL LI	NE LOSS	6,519 37.3%
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30	Note: Line 13 + Li	ne 21 + Line 28 Must Equal Line 4		
31				
32	WATER LOSS PE			
33	Unaccounted-For	Water (Line 28 divided by Line 4)		

For the Month of: February Year: 2019	Wate	r Utility:	Farmdale Water District		
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Water Produced Water Purchased 16,855	Filambhill (melli)	计设计 化二苯二苯基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲基甲	中国的大学的主义的主义的对抗,可以对于特别的自己的对抗,但是对于特别的主义的自己的证明,但可以是对于自己的对抗的对抗,但是不是不够的的。这个是对抗的一种的对抗的		And the second second second second
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					38.5%

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 2

Responding Witness: Brian Armstrong

- Q-2. Describe in detail the procedure utilized in preparing monthly water use and loss reports, including, but not limited to, the following:
 - a. How the utility calculates water loss, water treatment plant usage, system flushing, and disinfection byproduct flushing.
 - b. Identify by name and job title employees who prepare or assist in the preparation of the reports.
 - c. What is included in the water loss category. Specifically, state whether the utility includes water loss from known leaks and breaks in the water loss category.

A-2.

a. Water loss is calculated by use of the PSC's monthly Water Loss Report form. Water sales, system flushing, and fire department usage are subtracted from water purchased to arrive at the amount of unaccounted for water.

Farmdale does not have a water treatment plant. Since early 2019, the system flushing and disinfectant byproduct flushing have been measured by the use of a fire hydrant meter. This meter is installed on

the fire hydrants that are used to perform system flushing. Prior to that, Farmdale used a formula provided by KRWA to calculate the amount of water used for flushing. The formula required us to input the flushing flow rate and time of flushing to determine gallons flushed.

- b. The monthly line loss reports are now prepared by Farmdale's manager, Brian Armstrong.
- c. The "Water Loss" category on the monthly Water Loss Report is the unaccounted for water. This category is the unaccounted for water after water sales, system flushing, and fire department usage have been subtracted from water purchased. Most of the time this unaccounted for water is shown on the monthly water loss report as line breaks or line leaks.

Farmdale does not include water loss from known leaks and breaks in the "Other Water Used" category. Only system flushing and fire department usage is deducted to arrive at the amount shown in the "Water Loss" category.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 3

Responding Witness: Brian Armstrong

- Q-3. State whether the water utility has completed a water loss detection plan.
 - a. If the answer is yes, provide a copy of the last completed water loss detection plan.
 - b. If the answer is no, explain why a water loss detection plan has not been completed.

A-3.

- a. Yes. Attached is Farmdale's Water Loss Prevention and Leak

 Detection plan. This is part of Farmdale's Distribution System

 Operation & Maintenance Manual.
- b. N/A

WATER LOSS PREVENTION AND LEAK DETECTION

The goal of the water loss program is to reduce unaccounted-for water to 15% or less. In doing so, real and apparent losses must be addressed. Real loss consists of physical water losses from leaks, line breaks, tank overflows, etc. and places a financial and operational burden on the utility. Apparent loss consists of unauthorized consumption, customer metering inaccuracies, and errors in the meter reading and billing processes. This can result in overtime and wasted hours testing for leaks that are not real. Both types of loss must be addressed in order to meet the 15% goal.

Proper distribution management is the key to reducing water loss. Standard methods such as creating hydraulically isolated zones, accurate metering, pressure monitoring, tank performance, demand factoring and preventative maintenance are needed to identify real water loss.

The following plan outlines processes and procedures that Farmdale will conduct on a routine basis to identify and repair water line leaks, monitor water usage, eliminate tank overflows, to reduce its overall water loss.

1. Records

- A. INFRASTRUCTURE: Knowledge of water system components and how they function under normal operating conditions is crucial to identifying where water loss occurs. Infrastructure inventory, maintenance and operational performance records are maintained where applicable.
 - Water meters
 - Water mains
 - Service lines
 - Valves
 - Hydrants
 - Storage tank
- B. CUSTOMER: Billing and water usage data needs to be maintained as a historic record so that apparent losses can be identified.
 - Meter readings
 - Billing adjustments
 - Count of active/in-active meters

Total water usage by zone

2. Routine Procedures (Daily/Weekly/Monthly):

- A. MASTER METERS: Read & record purchase meters from Frankfort.
- B. RECORDING READINGS: Master meter readings are maintained in a spreadsheet.
- C. METER READING SCHEDULES: Meters are read at approximately the same time each month.
- D. FIELD PERSONNEL: All distribution personnel (meter readers, maintenance, etc.), shall immediately report any identified water leaks, tank overflows, or other concerns that are presently or could result in water leaks or loss. Water leaks, given the urgency of the problem reported are repaired immediately or at the earliest possible time,
- E. OFFICE PERSONNEL: All office personnel shall immediately report any customer reported leaks, tank overflows, pressure problems, or other issues (whether during regular operational hours or after hours) to the Maintenance Foreman.
- F. RECORDING DATA: Daily and monthly records (via computer data bases, manual logs, or spreadsheets) shall be maintained by appropriate personnel to record and analyze the following information:
 - Daily master meter readings
 - Pump station run times
 - Estimated water losses from line breaks, tank overflows, hydrant usage, flushing, etc.
 - Metered customer water sales by route
- G. DATA ANALYSIS: Water production and usage data obtained and recorded (item F above) shall be evaluated and analyzed on a daily/weekly/monthly basis to determine:
 - Metered usage
 - Known losses from line breaks, etc.
 - Water loss by distribution zone
 - Focus on distribution system zones: As funding permits, additional master meters and by-pass meters will be installed to further isolate smaller portions of the

distribution system in order to more accurately identify and correct water loss problems in specific areas of the system.

H. METER TESTING AND REPLACEMENT: Customer meters will be tested every ten years to ensure that they are registering water accurately. Meters between 1" and 3" shall be tested every three years and meters larger than 4" shall be tested annually. All meters will be replaced, as warranted.

3. LEAK DETECTION PROCEDURES

- A. FIELD PERSONNEL: On a routine basis, as system operations permit, the Water Works Supervisor will assemble a leak detection team to check the by-pass meter in each zone during a time when customer usage is minimal. This allows field personnel to go valve to valve (and often meter to meter) with listening devices and detect abnormal flows without affecting customer service. Personnel will perform leak detection in those areas with the highest known water loss, based on routine data collection and analysis.
- B. OUTSIDE CONSULTANTS: Outside consultants such as Kentucky Rural Water, contract engineer or industry specialists are utilized as circumstances dictate.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 4

Responding Witness: Brian Armstrong

- Q-4. State whether the water utility has completed a comprehensive unaccounted-for water loss reduction plan.
 - a. If the answer is yes, provide a copy of the last completed comprehensive unaccounted-for water loss reduction plan.
 - b. If the answer is no, explain why a comprehensive unaccounted-for water loss reduction plan has not been completed.

A-4.

- a. Yes. Reference attachment to Q-3 response.
- b. N/A

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 5

Responding Witness: Brian Armstrong

- Q-5. Describe and provide the results of all water loss reduction projects that the water utility has initiated from January 1, 2015, to the date of the issuance of this Order.
- A-5. Farmdale has undertaken two (2) major water loss reduction projects since 2015: (1) installation of Zone Meters; and (2) replacement of fire hydrants.

Zone Meters. In 2017, Farmdale engaged the services of HMB Professional Engineers, Inc. to design and supervise the bidding and installation of zone meters. The purpose of the project was to enable Farmdale to monitor the water demand within a specific zone and compare that to the water used by customers within that same zone. Farmdale's distribution system was divided into five (5) zones and a zone meter was installed for each zone. In addition, ten (10) by-pass meters were installed to monitor flows on certain water lines within a particular zone.

Unfortunately, because of limited staff and serious medical issues involving the former Manager's spouse, Farmdale has not yet reaped the benefits of the zone meters. The former Manager retired, unexpectedly, on August 31,2018 to care for his spouse. The new Manager has been with Farmdale since June 2018. There is only one (1) other "outside" employee to assist the Manager in operating and maintaining Farmdale's distribution system.

Fire Hydrant Replacements. Most of the fire hydrants located throughout Farmdale's distribution system were installed by developers who installed them as part of their subdivision developments. Both the water lines serving the subdivisions and the fire hydrants were donated to, and accepted by, Farmdale. The current Commissioners of Farmdale and its former Manager slowly began to realize that many of these fire hydrants might have been installed improperly (e.g. no gate valve to shut off the water going to the fire hydrant when not in use) or might need replacing for other reasons. As a result, they suspected that these fire hydrants could be a source of water leaks.

During the current Manager's short tenure, he has identified and replaced 27 fire hydrants that were leaking or otherwise needed to be replaced. With the assistance of Farmdale's "on call" contractor, B. P. Pipeline LLC, all 27 of these fire hydrants have been replaced with new fire hydrants. Farmdale

will continue to replace faulty or leaking fire hydrants as they are discovered.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 6

Responding Witness: Brian Armstrong

- Q-6. Provide a copy of the utility's most recent and updated annual and longrange Capital Improvement Plans.
- A-6. Farmdale does not have a long-range Capital Improvement Plan. The Commissioners do realize, however, that Farmdale needs to replace all of its Asbestos Cement (AC) water mains as soon as financing becomes available.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 7

Responding Witness: Brian Armstrong

- Q-7. Provide the names of the persons or entities responsible for assisting the utility with capital improvement planning, grant application assistance, engineering design, and construction services.
- A-7. HMB Professional Engineers, Inc.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 8

Responding Witness: Brian Armstrong

- Q-8. Provide a copy of the utility's preventative maintenance program for the plant, pump, and storage facilities.
- A-8. See attached Preventative Maintenance Program. The attached document is part of Farmdale's Distribution System Operation & Maintenance Manual.

PREVENTATIVE MAINTENANCE PROGRAM

The purpose of Farmdale's preventative maintenance program is twofold:

1) to ensure that equipment is properly functioning so that it meets or exceeds its expected service life and 2) to identify maintenance trends that consume a great deal of the operator's time in order to reduce long term operational costs and improve system reliability. Without a sound preventative maintenance program, labor costs for lost water production time due to unscheduled equipment breakdown will be incurred, damage to equipment can be much more severe and potential negative treatment process and/or regulatory ramifications can be unacceptable to the customer and costly to the system. Therefore, three levels of maintenance activities will be performed. These are predictive, preventative and breakdown maintenance.

Predictive Maintenance

The goal of predictive maintenance to identify potential equipment failure before a breakdown occurs. This level of maintenance relies upon testing equipment performance and analyzing operational trends. Testing may include such items as oil analysis to determine optimal oil replacement frequency, infrared analysis to ensure that electrical connections are sound and that there are no imminent electric failures about to occur, and vibration analysis to ensure that equipment is properly aligned and that bearing wear is identified well before failure occurs.

Preventative Maintenance

The primary goal of preventative maintenance is to prevent the failure of pumps and equipment before it actually occurs. It is designed to preserve and enhance equipment reliability by replacing worn components before they actually fail. Preventative maintenance activities include exercising valves and fire hydrants; equipment and tank inspections; partial or complete overhauls at regular specified periods; oil changes; lubrication; and so on. In addition, operators can record equipment deterioration so they know to replace or repair worn parts before they cause system failure.

Breakdown Maintenance

This is maintenance that must be performed because of unexpected equipment failure and is the most disruptive and costly type of

maintenance. Even under the best preventative maintenance program, some breakdown maintenance will occur. Each of these events provides a learning opportunity to improve upon existing preventative maintenance programs. The operator should evaluate every equipment breakdown situation to determine the cause and what measures could have been taken to prevent the occurrence. The lessons learned should then be added to the preventative maintenance program. Building these written feedback loops into the preventative maintenance program will yield significant returns.

The Water Superintendent, in conjunction with certified operators, is responsible for implementing the preventative maintenance program. The water treatment and distribution operators are responsible for performing the maintenance and recordkeeping. Inspection forms and maintenance schedules are located in Appendix D, however a generalized list of maintenance measures are as follows:

- ✓ Mechanical appurtenances of pump stations i.e.; motors/pumps, that require greasing, oiling or cleaning will be done as recommended by the manufacturer by the operator.
 - 1. Daily visual to locate leaks, check runtime and pressures;
 - 2. Monthly functional inspection including: control valve operation, exercise switch modes, lubricate all related components; and
 - 3. Annual maintenance to include discharge, amperage and pressure measurement for pump curve analysis.
- ✓ Pressure Reducing Valves (PRVs) are critical to controlling system hydraulics and maintaining consistent customer service. PRVs should undergo visual and functional inspections and undergo annual maintenance as recommended in the manufacturer manual.
 - 4. Monthly visual inspection to locate leaks and external damages;
 - 5. Quarterly functional inspection including: closing, opening and regulation of the PRV and by-pass; and
 - 6. Annual maintenance including internal component inspection.
- ✓ Records will be retained at the District office. These records are to include the following:
 - 7. List of Specifications for fuels, lubricants, filters, etc. for equipment;
 - 8. Trouble shooting charts or guides which reference page numbers in manufacturer service manual;

- 9. Inventory for each type of equipment to include numbering system, catalog, nameplate data cards, maintenance record cards;
- 10. Manufacturer maintenance schedule for routine adjustments; A summary with references to page numbers in manufacturer O&M manual needs to be provided.
- ✓ Hydrants and valves will be inspected/exercised in concert with flushing program.
- ✓ Storage Tanks are on contract with Caldwell Tank, Inc. to be inspected every 5 years.

Appendix A Flushing Record Form

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 9

- Q-9. State whether the water utility has assigned specific personnel the responsibility to detect and fix of water line leaks, and if so, state the names and job titles of such personnel and describe the functions and duties of each.
- A-9. Brian Armstrong, Manager, is responsible for detecting and fixing water line breaks. For large water main breaks, Farmdale utilizes a local contractor,B.P. Pipeline LLC. This contractor is "on call" and has assisted Farmdale with replacing fire hydrants and fixing large leaks.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 10

- Q-10. State whether leak detection is conducted on a daily basis, and if not, state the reasons why not.
- A-10. No, leak detection is not conducted on a daily basis. Farmdale has only two "outside" employees, including the manager. Thus, it does not have enough employees to dedicate one employee solely to conducting daily leak detections.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 11

- Q-11. Provide the number of completed water line leak repairs by category, i.e., mains, service lines, etc. that were completed from September 1, 2018, to the date of the issuance of this Order.
- A-11. Since September 1, 2018, Farmdale has repaired 13 water main leaks and made 10 service connection line repairs. (A service connection line is the line running from the water main to the customer meter.) In addition, 27 "leaking" fire hydrants have been replaced during this time period.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 12

- Q-12. Provide copies of each work order generated to investigate leaks reported by customers of the utility from September 1, 2018, to the date of the issuance of this Order.
- A-12. Copies of the work orders are attached.

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FARMDALE WATER DISTRICT

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FARMDALE WATER DISTRICT

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DATE JOB CO	MPLETED		LABOR	
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CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 13

- Q-13. Does the utility have a policy or operating procedure in place that addresses the process and the length of time it should take for the utility to fix a known or reported leaking water line? If yes, provide a copy of the policy or operating procedure.
- A-13. Farmdale does not have any written policy or procedure addressing this topic. Nevertheless, Farmdale's practice is to place a very high priority on fixing or repairing any reported water line leak.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 14

- Q-14. Provide a general asset ledger listing identifying all new equipment purchased by the utility from January 1, 2018, to the date of the issuance of this Order used in water loss reduction efforts (e.g., listening devices, flow meters, metal detectors, hand tools, etc.).
- A-14. Farmdale has purchased a fire hydrant meter to accurately measure the volume of water it flushes. In addition, it has purchased an AC pipe cutter to facilitate the repair of AC pipe leaks without endangering the health and safety of employees or the environment.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 15

Responding Witness: Brian Armstrong

- Q-15. Provide the type of training and the total amount of time the utility's personnel have received for leak detection and repairs since January 1, 2015, to the date of the issuance of this Order. List the personnel and dates of training.
- A-15. Farmdale's former manager, David Robinson, attended annual leak detection training classes taught by KRWA in April 2015, April 2016, and April 2017.

Farmdale's current manager, Brian Armstrong, received leak detection and repair training in December 2018 conducted by the Division of Compliance Assistance of the Kentucky Department for Environmental Protection.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 16

- Q-16. Does the utility have a policy to identify errors that result in missed customer billings or under billings of customer accounts? If so, provide a copy of the policy.
- A-16. Before the monthly customer bills are mailed, Farmdale's office staff reviews all bills for inaccuracies and abnormal usage and corrects any errors found. Farmdale does not have a written policy that addresses this subject.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 17

- Q-17. If the utility produces and treats water for its distribution system, provide the date that the utility's water treatment plant meter was last tested and state how frequently the utility's water treatment plant meter is tested. Provide a copy of the most recent meter test results.
- A-17. Farmdale does not produce or treat its water. It purchases all of its water from Frankfort Plant Board.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 18

Responding Witness: Brian Armstrong

- Q-18. Provide the dates on which the utility's master meters were last tested and the results of the tests.
- A-18. Farmdale does not have any master meters. Frankfort Plant Board supplies water to Farmdale through the use of three master meters: (1) 650 Evergreen Road; (2) Bentwoods Subdivision; and (3) Moss Lane. Frankfort Plant Board has these master meters tested on a regular basis. Copies of the Water Meter Inspection and Test Report and dates of testing are attached for each of the master meters.

The most recent Moss Lane report, dated April 2, 2019, notes that the meter failed the initial test. Frankfort Plant Board has ordered a new meter and will replace the malfunctioning master meter.



LOCATION: 650 Evergreen Rd	TEST DATE: 4-1-19
OWNER: Farmdale Water District	
F.P.B. Co. # 70252625	MFG.# 70252625

-TESTERS/ EMPLOYEE # 232/237

Date installed	Meter size	Meter brand & type	Length of meter	Length of strainer	Bypass	Air Quality Test
11/8/17	8"	Neptune Turbine	20"	10"	Y (§)	no
Type of Test	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean
Field Bench	YN	Y_N_	YN_	YN_	YN	YN
		HIGH:	INTERM.	LOW	Before Reading	After Reading
TEST RESULTS:		Test 1: 9914	Test 1: 100.3	Test 1: 98,5		17650700
		Test 2:	Test 2:	Test 2:		
		Test 3:	Test 3:	Test 3:		

Comments:

MIO# 1486494604

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4	WAICKI	aeiek im	SPECITOR	V & IESI I	KEPUKI		
LOCATION: 65	O Eyer	green RL	pump hours	TEST DATE:	11-6-17)	
OWNER: FUE	dale L	water	e de la companya del companya de la companya del companya de la co				
F.P.B. Co. # 2	0256	L.J.		MFG.# 7	0 252625		
t (⁵⁰ 1%*		-TESTERS/ EN	MPLOYEE # 23	2/ 234			
Date installed	Moter size	Meter brand & type	Length of motor	Length of strainer	Bypass	Air Quality Test	anto Syra
	8"	resture Turbin	20	20	V // OnOff	10	
Type of Test Feb Bench	Water In plt	Electric in pit	Sump Pump	Ladder	Valves Operable		
	Y_ N_/	YZN	Y <u>Y</u>	Y_NZ	Y_N	Y Laurence Nacconstruction	jus Milayari,
TEST RESULTS:		HIGH: Test 1: /CO./2	Test 2:	L <u>OW</u> A <u>Test 1: </u>	Before Reading	After Reading	a
		Tost 3:	Test 3:	Tost 3:			
# 2000-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0-100-0	entern asione vojo or olg tri Britishik hod vojdan <mark>gelege</mark> na n				and the second s	Accounty of the same of	····
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		A _I	proved by:	* **	Da	ito:	-



LOCATION: Bentwood Subdivision				TEST DATE: 4-2-19		
OWNER: Farm	lale Wate	c Distait				
F.P.B. Co. # 703	07154			MFG.# 70	307154	
		-TESTERS/ EM	PLOYEE #			
Date installed	Meter size	Meter brand & type	Length of meter	Length of strainer	Bypass	Air Quality Test
8/7/15	4"	Neptune Compound	20"	7'/2"		ng mangangan di mandakan di mangangan di mandakan di mangan di mandakan di mangan di Samandak
Type of Test	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean
Field Bench						
and the state of t	Y_N_/	Y N		Y N		Y_ N
		HIGH:	INTERM.	LOW Test 1: / 6: 7: 4:	Before Reading	After Reading
TEST RESULTS:		Test 1; 9 7 %.	İ			57345
		Test 2: 100.4%	Test 2: / 4 (**)	Test 2: 10 1 %		same
		Test 3:	Test 3:	Test 3:		
Company of the Compan		Anna Anna anna anna anna anna anna anna		Andrew Mayor of the State of th		and the second s
Comments:	10					
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3/4" MINH 1853135148

4"



F.P.B. Co. # 763	07154	***************************************	MPLOYEE#_23	MFG.# 70	307154	- ner nystadromatika kodinennya
Date installed	Meter size	Meter brand	Length of moter	Length of strainer	Bypnss	Air Quality Test
	4"	Nephone Compand	20"	ז'/2"	On_ OII_	Yes
Type of Test (eld) Bench	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean
TEST RESULTS:	Temporor	HIGH: Tost 1: 98. 7	INTERM. Test 1: 98. 2	LOW Test 1: 99 3	Before Reading	1
		Test 3:	Test 2:	Tost 3:	9179453.2)	4179500.7

Approved by: Brun Born Date: 11/6/17



F.P.B. Co. # 70	311 285		MFG.# Same					
		-TESTERS/ E	WPLOYEE # 23	2/249				
Date installed	Meter size	Motor brand & type	Length of moter	Longth of strainer	Bypass	Air Quality Test		
	4"	compand	20"	2.50	01 011 / N	405		
Field Bench 75 p5	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean		
TEST RESULTS:	Yestidaw N.Z.	Y N_/ HIGH: Tost 1: 984	Y_N/ INTERM. Tost 1: OI, O	LOW Lost 1: 10 O.0 Jest 2:	NNBefore Reading	After Reading		
		Test 3:	Tost 3:	Test 3:	The second secon	4 " 27 9018		

Approved by: 10-16-16 Date: 10-16-16



LOCATION:	055 Ln			TEST DATE:	4-2-19			
OWNER: Formula	le Waker	District	· ` ` ` ` ` ` ` `					
F.P.B. Co. # 7()	03336	1949.00		MFG.# 70	103336			
		-TESTERS/ EM	PLOYEE # 232	/237				
Date installed	Meter size	Meter brand & type	Length of meter	Length of strainer	Bypass	Air Quality Test		
8/21/15	6"	Neotune Compound	24''	d.,				
Type of Test	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean		
Field Bench								
	YN_/	Y N	Y_ N_	Y N	Y/_N	Y_/N		
		HIGH:	INTERM.	LOW	Before Reading	After Reading		
TEST RESULTS:		Test 1: 98.5	Test 1: /46 6	Test 1: /OA./	41	42		
		Test 3:	Test 3:	Test 3:	855 41	85543		
Comments:		, , , , , , , , , , , , , , , , , , , ,						
6" M20# 1834464974 1" M20# 1834454663		ied test) rdered	New O	ne		



LOCATION: Mos	s Ln			TEST DATE:	9/6/18	·/
OWNER: Found	ale Water	District				
F.P.B. Co. # 7010	13336			MFG.# 70	0103336	
		-TESTERS/ EN	APLOYEE#_ <u>>_3</u>	2/237		
Date installed	Meter size	Meter brand & type	Length of meter	Length of strainer	Bypass	Air Quality Test
	6"	Neptune Compound	20"	9"	X N OnOff/	405
Type of Test Field Bench	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean
	YN_V	Y N/	YN_/	Y/ N	YN	Y_1/N
TEST RESULTS:		HIGH: Test 1: 97.5 Test 2: Test 3:	INTERM. Test 1: / 00 / / Test 2: Test 3:	LOW Test 1: 44,6 Test 2: Test 3:	Before Reading ドンタ 10 7877年	After Reading H: 3の Lの 78377
Comments:			1001.01	1651.3.		

Cleaned Strainer

Approved by: Bin Bon Date: 9/2/8



LOCATION: MO	5 LJ		TEST DATE: 10-5-17							
OWNER: Farmas	de water D	White		.						
F.P.B. Co. # 70	107336	·	•	MFG. # 701033312						
		-TESTERS/ E	MPLOYEE# <u>23</u> 6	2/234	-					
ite installed	Meter Meter brand size & type		Length of meter	Length of strainer	Bypass	Air Quality Tost				
	C"	nept.	24"	9"	Ø N On_OIF_X	1 C3				
on of Test d Bench	Water in pit	Electric in pit	Sump Pump	Ladder	Valves Operable	Pit clean				
	YNX	Y NX	Y_NX	Y X N	YN	Y & N_				
TEST RESULTS:	And the second s	HIGH: Test 1: JOLY Tost 2:	INTERM. Tost 1: 1072 Test 2:	LOW Test 1: 49.7	Before Reading	Alter Reading				
		Tost 3:	Tost 3:	Tost 3:	23187	23 C8C				
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1" miu - 1834454663

6" miu- 1834464974

Date: 10/9/17

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 19

Responding Witness: Brian Armstrong

- Q-19. Provide the utility's procedure and schedule for testing its master meters and customer meters.
- A-19. The master meters belong to Frankfort Plant Board. FPB usually tests the meters on an annual basis. Farmdale does not test its customer meters unless there is a customer complaint or a customer request. The customer meters are tested by C.I. Thornburg Company.

In 2012, Farmdale switched to "radio-read" and installed all new meters.

Thus, the meters are less than ten (10) years old.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 20

- Q-20. State the number of meters that have been replaced by the utility from January 1, 2018, to the date of the issuance of this Order.
- A-20. Farmdale has replaced 30 customer meters that were damaged, malfunctioning, or otherwise defective.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 21

- Q-21. Provide the type of metering equipment, including brands and model numbers, the utility uses.
- A-21. Farmdale uses only Sensus manufactured meters. In 2012, all meters were replaced with iPERL meters. As the iPERL meters malfunction or become damaged, they are replaced with Sensus SR II meters.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 22

- Q-22. State whether the utility utilizes supervisory control and data acquisition (SCADA) technology within its system.
- A-22. Yes.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 23

Responding Witness: Brian Armstrong

Q-23. State whether the utility utilizes telemetry within its system.

A-23. Yes.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 24

- Q-24. State whether all meters within the utility's distribution area are read monthly. If all meters are not read monthly state the reasons why not.
- A-24. Farmdale has approximately 2,655 meters. All meters are read each month utilizing "radio-read" technology. Historically, approximately 160 meters each month had to be manually read because of malfunctioning data transmission. Farmdale has worked to decrease this number and between 30 and 40 of these meters have been replaced. Last month, only 120 meters had to be read manually.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 25

- Q-25. What training is provided to the utility's meter readers?
- A-25. On the job training

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 26

Responding Witness: Brian Armstrong

- Q-26. Does the utility utilize master meter zones in leak detection? If yes, for each of the utility's master meter zones, provide a monthly comparison of the master meter readings to the total customer meter readings for that zone for December 2018 and January 2019.
- A-26. Yes. Farmdale installed five (5) zone meters in 2017 to enhance its leak detection efforts. Attached are the monthly comparisons for each of the five (5) zone meters.

As stated in response to Q-5, however, Farmdale has not been able to fully take advantage of these zone meters because of limited personnel and the unexpected retirement of its former Manager in August 2018.

2018 WATER LOSS BY ZONE

2018	Customers	January	January	January	February	February	Februar	March March	March	March	April	April	April	Radio No.
		Purchased	Sold	% Loss	Purchased	Sold "	% Lass	Purchased	Sold	% Loss	Purchased	Sold	% Loss	
00 Evergreen Rd	494		Control of the Contro			3, 073,400								
01 Coolbrook	598		7			1,968,300								The state of the s
06 Highway 151	257	2,400,000	1,022,800	57.4%	2,144,000	906,700								87502152
08 L'burg Road	233	1,527,000	1,065,000	30.3%	1,336,000	1,189,600		1,570,000			1,356,000			17288382
10 Mills Lane	284	2,413,000	971,200	59.8%	2,244,000	878,300	(1)	2,566,000			2,290,000	Kara Salasa		87512844
13 Bentwoods	336	2,430,800			2,030,000	1,389,000	(1,757,900			1,774,800			
15 Benson Valley	17	141,600			119,100	103,600	- -	74,300			80,500			
45 Green Wilson	431	1,707,000	1,473,900	13.7%	1,518,000	1,291,500		2,474,000			1,640,000			87441684
61 South Benson														875()6
Total	2650	23,402,000	11,630,000	50.3%	22,474,000	10,819,000	51.9%	15,227,000	12,923,000	15.1%	17,475,000	11,139,000	36.2%	
2018	Customers	May	May	May	June	June:	June	July	July	July	August	August	August	
		Purchased	Sold	% Loss	Purchased	Sold :	% Loss	Purchased	Sold	% Loss	Purchased	Sold	% Loss	
00 Evergreen Rd	494													
01 Coolbrook	598													
06 Highway 151	257	no read			no read			no read			no read			87502152
08 L'burg Road	233	1,564,000			1,601,000		4	1,561,000			1,778,000			17288382
10 Mills Lane	284	2,298,000			2241000			2,231,000			2,209,000			87512844
13 Bentwoods	336	1,940,600	rotti (1,592,600			1,586,600			1,752,800			
15 Benson Valley	17	115,700			124,400			139,000			140,300			
45 Green Wilson	431	2,011,000			1,988,000			1,883,000			1,942,000	i de la companya de		87441684
61 South Benson							11.0							87507496
Total	2650	18,106,000	14,414,000	20.3%	15,472,000	14,143,000	8.5%	16,281,000	13,664,000	15.2%	16,273,000	14,854	8.7%	
2018	Customers	September	September	September	October	October	October	November	November	November	December	December	Decembe	
		Purchased	Sold	% Loss	Purchased	Sold	% Loss	Purchased	Sold	% Loss	Purchased	Sold	% Loss	
00 Evergreen Rd	494		100											
01 Coolbrook	598													
06 Highway 151	257	no read			No read			No read			No read			87502152
08 L'burg Road	233	1,450,000			1,661,000			1,336,000			1,362,000	l illerine	100	17288382
10 Mills Lane	284	1,397,000			1,567,000			1,595,000			1,945,000			87512844
13 Bentwoods	336	1,815,500			1,832,700			1,719,900			1,742,100			
15 Benson Valley	17	69,200			64,900			80,200			95,500			
45 Green Wilson		1,576,000			1,771,000			1,575,000			1,782,000			87441684
61 South Benson		bad			Bad			Bad			Bad			87507496
Total	2650		13,666,000	26.1%	16,938,000	14,853,000	12.2%	18,185,000	10,917	39.6%	17,318,000	11.884	31.4%	5

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 27

- Q-27. State whether the utility uses a system-wide hydraulic model to evaluate the pressure zones and flow in the utility's distribution system.
- A-27. No. Farmdale recognizes the value of having a system-wide hydraulic model, but has not yet invested the funds to hire an engineering firm to prepare and calibrate a system-wide hydraulic model.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 28

- Q-28. Does the utility manager regularly report the water loss reduction efforts to the water utility's board of commissioners? Provide copies of any written reports, memorandums, letters, emails, or minutes from January 1, 2018, to the date of the issuance of this Order that details the efforts of the utility manager in reducing water loss as reported to the water utility's board of commissioners.
- A-28. Yes. Farmdale's Manager provides a copy of the PSC Monthly Water

 Loss Report to the Farmdale Board of Commissioners at each month's board meeting.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 29

- Q-29. For the period from January 1, 2015, to the date of the issuance of this Order, discuss whether the water utility's board of commissioners has placed any deadlines or target dates on the utility for achieving a reduction in the amount of water loss.
- A-29. Farmdale's Board of Commissioners has set a goal of reducing its water loss to a level that is 15% or less. It hopes to achieve this goal as soon as possible. The water loss was substantially reduced in 2018. The 2018 annual water loss was 28% (see attachments to Q-1).

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 30

- Q-30. Provide a list of the utility management's five most critical projects, listed in order of priority, notwithstanding the opinions of the county judge/executive nor the opinions of the water district board of commissioners.
- A-30. As Manager of Farmdale, my top five (5) critical projects are shown below:
 - 1. Reducing Number of Meters That Must Be Read Manually. In 2012 and 2013, Farmdale replaced all its meters with "drive-by" radio read iPERL meters manufactured by Sensus. After "reading" the meters by "driving-by" the meters located throughout the entire distribution system, a report is generated that lists all the meter locations that were not "read" properly. The errant or missing meter "readings" could be the result of various factors, including the following: defective or worn-out battery, damaged wire leading from the digital readout device to the radio transmitter, damaged radio transmitter, frozen or broken meter, or various

other issues. Using this report, I then must return to each meter location where no digital reading was received (or an incorrect reading) and manually read each of these meters. It takes about two (2) days to perform the "drive-by" reading. Then it takes another two (2) or three (3) days to revisit the meter locations and manually read the balance of the meters. When I started working for Farmdale in 2018, there would be over 160 meters that would have to be manually read each month. Now, that number has been reduced to about 120 manual meter reads each month. If I had another worker, we could more quickly perform the necessary repairs (replacing batteries, transmitters, wires, meter replacements, etc.,) so the number of meters that must be read manually could be reduced to less than one (1%) percent.

- 2. **Installing Backflow Preventers**. Many of the meter installations do not have double check-valves (backflow preventers). I need to replace the meter setters with new setters that come with pre-installed backflow preventers. This will not reduce water loss, but it is a safety issue. Best utility practices dictate that all meter installations have backflow prevention devices.
- 3. **Meter Vault Repairs**. Many of the meter vaults need replacing because they were made of inferior, thin-walled material. As a result, the

vaults have become deformed and the meter lids do not fit properly. It is also difficult to operate the turn on and off valve located near the bottom of the vault.

- 4. **Replace All Lines in Edgewood Subdivision**. The entire water main in the Edgewood Subdivision (approximately one (1) mile) needs replacing. The water main in this subdivision is "thin-walled" pipe. It has been the source of many leak repairs in my short tenure with Farmdale.
- 5. **Replace All AC Pipe**. Farmdale's entire original distribution system consists of various sizes of AC pipe. I don't know the exact number of miles of AC pipe, but it has been estimated at 40 to 50 miles. This pipe is very old and brittle. It is very difficult to repair it. This would be my second highest priority project, but for the prohibitive cost of replacing the AC water mains.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 31

- Q-31. Provide the total salary of the general manager/superintendent of the water utility for calendar years 2017 and 2018.
- A-31. The former manager's salary for 2017 was \$46,901. He retired on August 31, 2018. His salary for the first eight (8) months of 2018 was \$33,189. Farmdale's current manager's salary is \$20/hour.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 32

- Q-32. Provide a copy of the most recent signed employment contract between the general manager/superintendent and the utility.
- A-32. Farmdale's Manager does not have a written contract.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 33

Responding Witness: Brian Armstrong

- Q-33. State the average age, with the high and low ages, of the utility's distribution mains.
- A-33. Oldest water mains: 50 years

Newest water mains: 7 years

Average: 28 years

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 34

Responding Witness: Brian Armstrong

Q-34. "Service connection," as defined by 807 KAR 5:066(6), means the line from the main to the customer's point of service, and shall include the pipefittings and valves necessary to make the connection. State the average age of the utility's service connections.

A-34. Average age: 28 years

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 35

- Q-35. Has the utility mapped the entire distribution area for service connections to include mapping of its system, and identifying parts of its system with repeated breaks?
- A-35. Farmdale's entire distribution area has been mapped. Service connection lines are not shown on the map. Meter locations are shown, however. The map does not show areas with repeated breaks. Farmdale's Manager is aware that the Edgewood subdivision is the area with the most repeated breaks.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 36

- Q-36. Provide a copy of the utility's policy for dealing with apparent theft of water.
- A-36. Farmdale does not have a written policy regarding theft of water service.

 Its practice, however, is to lock or remove the customer's meter if theft of service has occurred.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 37

Responding Witness: Brian Armstrong

- Q-37. Provide documentation of any request by the utility from January 1, 2017, to the date of the issuance of this Order to the county attorney or commonwealth attorney's office for the prosecution of any person for the theft of water.
 - a. State whether the utility provided information related to the request for prosecution to the county attorney or commonwealth attorney's office for this time frame.
 - b. If the response to Item 37a. above is confirmed, state to which office the utility provided the information, whether any action was taken on behalf of the utility to prosecute any person for theft of water, and provide copies of the documentation and correspondence related to the prosecution.

A-37.

a. Farmdale has not requested the County Attorney or Commonwealth's

Attorney to prosecute any person for theft of water service.

b. N/A

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 38

- Q-38. Provide the utility's policy for determining whether a leak adjustment to a customer's account is warranted and identify the person(s) that approve leak adjustments.
- A-38. Farmdale's written Leak Adjustment Policy does **NOT** permit a customer's bill to be adjusted when a leak has occurred. Its written policy is part of its PSC-approved Tariff. The relevant tariff sheet is attached.

	FOR Southwest Franklin County, Kentucky Community, Town or City
	P.S.C. KY. NO1
	1st Revised SHEET NO. 16
Farmdale Water District	CANCELLING P.S.C. KY. NO. 1
(Name of Utility)	Original SHEET NO. 16
R.A	ATES & CHARGES
incurs a significant cost for water and these	ustomer's bill when a leak has occurred. The utility costs must be recovered. Therefore, the customer the meter at the utility's regular schedule of rates.
-	

DATE OF ISSUE March 8, 2016 Month / Date / Year	KENTUCKY PUBLIC SERVICE COMMISSION
DATE EFFECTIVE May 1, 2016 Month / Date / Year	Aaron D. Greenwell ACTING EXECUTIVE DIRECTOR
TITLE Charmer Rown Con mieur	Bunt Kirtley
BY AUTHORITY OF ORDER OF THE PUBLIC SERVICE COMMISSION IN CASE NODATED	EFFECTIVE " 5/1/2016 PURSUANT TO 807 KAR 5:011 SECTION 9 (1)

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 39

- Q-39. State whether the utility's tariff permits the utility to adjust late charges when making a leak adjustment.
- A-39. As stated in the response to Q-38, Farmdale does not make leak adjustments. If a customer is enrolled in a Payment Plan and is making payments according to the agreed schedule, late charges are not applied.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 40

Responding Witness: Brian Armstrong

Q-40. Provide a copy of the utility's most recent Leak Adjustment Worksheet that was used by the utility and explain what software is being used by the utility to generate the Leak Adjustment Worksheet. If the utility is using Microsoft Excel to generate the Leak Adjustment Worksheet, then provide a copy of the most recent Leak Adjustment Worksheet used by the utility in electronic format with all rows unprotected and all formulas intact.

A-40. N/A

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 41

Responding Witness: Brian Armstrong

Q-41. State whether the utility has conducted a comprehensive water audit, and if so, provide a copy of the most recent water audit.

A-41. No.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 42

Responding Witness: Brian Armstrong

- Q-42. Provide a copy of the utility's procedure for monitoring and documenting withdrawals from the utility's distribution system by fire departments. If no document exists, explain the process in detail.
 - a. For each fire department that made a withdrawal from the utility's system from January 1, 2018, to the date of the issuance of this Order, provide a copy of the fire department's estimate of its withdrawal.
 - b. For any instance in which a fire department failed to provide an estimate of withdrawal from January 1, 2018, to the date of the issuance of this Order, state the actions the utility implemented to correct the failure.
 - c. Provide the date on which the utility last imposed a penalty on a fire department for the fire department's failure to submit a quarterly report on its water usage.
 - d. Provide a sample copy of each type of report form that the utility provides to fire departments.
 - e. Provide the fourth quarter of the 2018 fire protection water usage, by month, and describe the formula relied upon, identifying all variables, and all assumptions and workpapers utilized to produce this information.
- A-42.

a-e: Fortunately, there is only one fire station in Farmdale's service area.

Farmdale has a good working relationship with this fire department. The

fire department provides monthly reports to Farmdale.

The water usage reports for the fourth quarter of 2018 and the first quarter of 2019 are attached.

Franklin Co Fire Dept Station 8

No. 0715 P. 1

FRANKLIN COUNTY FIRE DEPARTMENT 975 CHENAULT RD FRANKFORT, KY. 40601

WATER USAGE REPORT MONTH ALS - Dec 2018 STATION LOCATION

DATE	AMOUNT USED
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FRANKLIN COUNTY FIRE DEPARTMENT 975 CHENAULT RD. FRANKFORT, KY, 40601

WATER USAGE REPORT
MONTH JON 2019
WATER DISTRICT FORM CALL
STATION LOCATION SUCCESSION COL

DATE	AMOUNT USED
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FRANKLIN COUNTY FIRE DEPARTMENT 975 CHENAULT RD. FRANKFORT, KY, 40601

WATER USAGE REPORT Q

MONTH FED 2019

WATER DISTRICT FORM OF THE STATION LOCATION EVER GIEEN ROLL

STATION LOCATION EVER GIEEN ROLL

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FRANKLIN COUNTY FIRE DEPARTMENT 975 CHENAULT RD. FRANKFORT, KY, 40601

WATER USAGE REPORT
MONTH MAYOUNG ON THE WATER DISTRICT TO FOR MOULD STATION LOCATION EVEL A FEEL REPORT

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CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 43

- Q-43. Explain how the utility accounts for flushing when determining water loss for its system.
- A-43. Farmdale recently purchased a hydrant meter to measure the volume of water used in flushing its system.

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 44

Responding Witness: Brian Armstrong

Q-44. Provide the type of flushing equipment that the utility uses.

A-44. Hydrant meter

CASE NO. 2019-00041

Response to Commission's Request for Information

Question No. 45

- Q-45. Provide the utility's system flushing records, by month, from January 1, 2018, to the date of the issuance of this Order, and describe the formula relied upon, identifying all variables, and all assumptions and workpapers utilized to produce this information.
- A-45. Flushing records are attached.

Farmdale Water District Monthly Flushing Log

Month Year	2018		Monthly Flushing Log	
NOV 2 DEC 12	Location Danenport's 1671 cardwell 1823 Cordwell 2261 Cardwell 2296 Cardwell 1671 Cardwell 1671 Cardwell 2012 Jones LN Raven Wood		10 mins 20 mins 5 mins 5 mins 15 mins	Gallons Flushed 760 gallors 3,778 gallors 2,663 gallors 10,000 gallor
Gallons F	lushed for Month	* - *		0

CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that Farmdale Water District's electronic filing of this Response is a true and accurate copy of the same document being filed in paper medium; that the electronic filing was transmitted to the Public Service Commission on April 12, 2019; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that an original paper medium of this Response will be delivered to the Public Service Commission within two business days.

Damon R. Talley